

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 State Bar No. 11479  
4 MONIQUE KIRTLEY  
5 Assistant Federal Public Defender  
6 411 E. Bonneville Avenue, Suite 250  
7 Las Vegas, Nevada 89101  
8 (702) 388-6577  
9 (Fax) 388-6261

10 Attorneys for Albert Lafarga-Cruz

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13 UNITED STATES DISTRICT COURT  
14 DISTRICT OF NEVADA

15 \* \* \*

16 UNITED STATES OF AMERICA,  
17 Plaintiff,  
18 vs.  
19 ALBERT LAFARGA-CRUZ,  
20 Defendant.

21 Case No.: 2:13-cr-00085-APG-PAL

22 **MOTION TO REQUEST PRE-TRIAL  
SERVICES INTERVIEW ALBERT  
LAFARGA-CRUZ WITH PROPOSED  
ORDER**  
(Expedited Treatment Requested)

23 COMES NOW the defendant, Albert Lafarga-Cruz, by and through his counsel of  
24 record, Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public  
25 Defender, counsel for defendant and files this Motion to Request Pre-trial Services to Interview Mr.  
26 Lafarga-Cruz for the following reasons.

27 DATED this 14<sup>th</sup> day of May, 2013.

28 RENE L. VALLADARES  
Federal Public Defender

/s/ *Monique Kirtley*

MONIQUE KIRTLEY  
Assistant Federal Public Defender

**MOTION TO REQUEST PRE-TRIAL SERVICES INTERVIEW**  
**ALBERT LAFARGA CRUZ**

On April 27, 2013, the defendant, Albert Lafarga-Cruz (“Lafarga”), made an initial appearance before Magistrate Judge Cam Ferenbach. Mr. Lafarga was detained as a flight risk and a danger to the community. It appears from the Order that the Court did not have any verifiable information regarding Mr. Lafarga as he had not interviewed with Pre-trial Services. The undersigned counsel filed a Motion to Re-Open Bail. A hearing on the Motion is scheduled for May 21, 2013 at 10:00 a.m. Prior to the hearing, Mr. Lafarga would like the opportunity to be interviewed by Pre-trial Services. In order to have Mr. Lafarga interviewed, the undersigned respectfully requests that this Court order Pre-trial Services to interview him prior to the 10:00 a.m., on May 21, 2013. Undersigned counsel is including a proposed order that would accomplish what is being requested in this motion.

DATED this 14<sup>th</sup> day of May, 2013.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

*/s/ Monique Kirtley*

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MONIQUE KIRTLEY  
Assistant Federal Public Defender  
Counsel for Albert Lafarga-Cruz

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \*

UNITED STATES OF AMERICA,

Case No.: 2:13-cr-00085-APG-PAL

Plaintiff,

## ORDER

VS.

ALBERT LAFARGA CRUZ.

Defendant.

10 The reasons being sound and in the best interests of justice and judicial economy  
11 being served. if time and resources are available

12 IT IS ORDERED that Pre-trial Services conduct a pre-trial interview ~~on May 21,~~  
13 and the court on or before May 20, 2013.  
13 ~~2013 prior to 10:00 a.m. and make the report available to the parties as quickly as possible.~~

DATED this 15th day of May, 2013.

Carl Becker

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UNITED STATES MAGISTRATE JUDGE

## CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on May 14, 2013, she served an electronic copy of the above and foregoing

**MOTION TO REQUEST PRE-TRIAL SERVICES INTERVIEW ALBERT LAFARGA**

**CRUZ WITH PROPOSED ORDER**, (Expedited Treatment Requested), by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
SUSAN CUSHMAN  
Assistant United States Attorney  
333 Las Vegas Blvd. So., 5<sup>th</sup> Floor  
Las Vegas, Nevada 89101

/s/ *Blanca Lenzi*

## Employee of the Federal Public Defender